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## UNITED STATES BANKRUPTCY COURT DISTRICT OF WYOMING

In re:	
	) Case No.: 16-20326
POWELL VALLEY HEALTH CARE,	) Chapter 11
INC.,	)
Debtor.	)

## DEBTOR'S MOTION TO EXTEND TIME TO FILE REMAINING SCHEDULES AND STATEMENTS

Undersigned counsel for Powell Valley Health Care, Inc. ("PVHC"), Debtor, hereby files this Motion to Extend Time to File Remaining Schedules and Statements (the "Motion"), and in support thereof would show the Court as follows:

- 1. On May 16, 2016 (the "Petition Date"), PVHC commenced this case by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of Wyoming (the "Bankruptcy Court").
- 2. PVHC has continued in the possession of its property and has continued to operate and manage its business as a debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108.
  - 3. The section 341 meeting of creditors has been set for June 9, 2016.

- 4. On May 16, 2016, the Clerk of Court issued its Deficiency Notice wherein it notified PVHC that it had until May 31, 2016, to file its remaining schedules and statements (collectively, the "Schedules and Statements").
- 5. Although a substantial portion of the Schedules and Statements were drafted prior to the Petition Date, certain underlying data needed to complete the Schedules and Statements was not known until after the Petition Date considering that PVHC has continual and constant fluctuations in financial data (*i.e.*, cash on hand, accounts receivable, accounts payable, etc.).
- 6. Since the Petition Date, counsel for PVHC and its representatives have been forced to divert their attention away from finalizing the Schedules and Statements in order to address numerous creditor/vendor issues, and continued (and unexpected) violations of the automatic stay. Further, the undersigned as well as the representative from PVHC that will be integral in completing the Schedules and Statements will be traveling over the Memorial Day weekend and will otherwise be unavailable to finalize the Schedules and Statements. As a result, the Schedules and Statements will not in a form acceptable for filing prior to May 31, 2016.
- 7. Thus, PVHC requests that the deadline to file its remaining Schedules and Statements be extended to on or before June 6, 2016. No party in interest will be prejudiced by this extension considering, in part, that the scheduled 341 meeting of creditors is not until June 9, 2016.
- 8. PVHC has conferred with the US Trustee with respect to this extension and the US Trustee has indicated that it has no objection with an extension until June 6, 2016.

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WHEREFORE, for the reasons set forth herein, PVHC respectfully requests that the Bankruptcy Court extend the deadline for filing PVHC's remaining Schedules and Statements to on or before June 6, 2016.

Dated: Cheyenne, Wyoming May 24, 2016

## MARKUS WILLIAMS YOUNG AND ZIMMERMANN LLC

By: /s/ Bradley T. Hunsicker

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